

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PHILIP GODLEWSKI

Plaintiff,

vs.

JEANETTE JOY GEARY

Defendant.

NO. 3:21-CV-2178

CIVIL ACTION

JURY TRIAL DEMANDED

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

On October 17, 2022, this Court issued an Order to Show Cause why the above-captioned case should not be dismissed for failure to prosecute. [ECF 9].

In answer thereto, Plaintiff responds as follows;

1. Plaintiff attaches two explanatory affidavits from the paralegals of Kolman Law that have dedicated many hours to arranging and setting up service of the Complaint.
2. The Affidavit of Kathleen A. Carrozza, hereto attached and incorporated as Exhibit 1, describes the broad effort of the Law Firm to find Ms. Geary and serve her, noting that Plaintiff did hire private detective Larry Forletta, who also failed to locate Defendant.
3. Mr. Forletta provided the Law Firm with Form 4-62.2b recommending that it be taken to the most appropriate local Post Office to discover any recent change of Ms. Geary's address. He was of the opinion that as barred attorney representing a client, they may oblige to providing the information to him.
4. As the Court will note from Sarah Small's Affidavit attached hereto and incorporated as Exhibit 2, Plaintiff now believes that West Chester Post Office is the most likely Post Office to yield a valid new address

5. Form 4-62.2b must be hand-delivered to the Post Office from the Law Offices, which Ms. Carrozza will do next week. If the Post Office requires an Attorney of the office to submit the form rather than a support staff member, Attorney Kolman will personally take the form to the West Chester Post Office.

Plaintiff, therefore, respectfully requests an additional 30 days to effect service.

Respectfully submitted,

KOLMAN LAW, P.C.

BY: /s/ Timothy M. Kolman

Timothy M. Kolman, Esquire
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Dated: October 27, 2022